

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re J.P. Morgan Stable Value Fund ERISA Litigation) Master File No. 12-cv-2548-VSB

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Fed. R. Civ. Proc. 23(e) and the Settlement Agreement¹ in this matter, Plaintiffs, through undersigned counsel, move this Court for an Order: (1) granting final approval of the Settlement Agreement, and (2) entering judgment in this matter, as set forth in the proposed Final Order Approving Class Action Settlement and proposed Judgment.² This motion is unopposed by Defendants.

The grounds for this motion are that the proposed Settlement Agreement is fair, reasonable and adequate, as established in (1) Plaintiffs' Memorandum in Support of Motion for Final Approval of Class Action Settlement, with attached exhibits including the Declaration of Co-Lead Class Counsel Michael M. Mulder, the Declaration of Phillip G. Greenfield, and the Declaration of Andrew Sommer; (2) the records and files in this action; and (3) such other matters as may come to the Court's attention prior to or at the hearing on final approval of the settlement.

Date: August 8, 2019

Respectfully submitted,

/s/ Michael M. Mulder
Michael M. Mulder

¹ Unless otherwise defined, all capitalized terms have the meanings ascribed to them in the Second Amended Settlement Agreement, filed as Exhibit A to the Memorandum in Support of this Motion.

² The proposed Final Order and Judgment will be submitted to the Court prior to the Fairness Hearing. The proposed Final Order will be revised from that attached to the original Settlement Agreement (Doc. 400-1, Ex. 6) to incorporate changes made in the Court-approved First and Second Amended Settlement Agreements and for the Judgment to be set forth in a separate document.

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